

REMARKS

The present Amendment and the Request for Continued Examination (RCE) are filed in response to the Appeal Decision that was decided on March 16, 2009.

Previous Claims 1-32 have been canceled. Claims 33-58 have been newly added. Hence, Claims 33-58 are pending in the present application.

I. ISSUES RELATING TO THE CITED ART

A. INDEPENDENT CLAIM 33

Among other features, Claim 33 recites:

instantiating a first instance of a class and a second instance of said class, wherein said class includes a single-valued property attribute; wherein both said first instance of said class and said second instance of said class include said single-valued property attribute;
assigning to said single-valued property attribute of said first instance a first value that associates a first set of one or more attributes with said first instance;
assigning to said single-valued property attribute of said second instance a second value that associates a second set of one or more attributes with said second instance;
wherein said first set of one or more attributes is different than said second set of one or more attributes;
wherein said first set of one or more attributes and said second set of one or more attributes are not included in said class or any superclass of said class;
...

Thus, the above features of Claim 33 indicate that two different instances of the same class are associated with two different sets of attributes that are not included in the class or any superclass of the class. It is respectfully submitted that the cited reference of Ng et al., U.S. Patent No. 6,385,618 ("NG") does not describe or suggest the above features of Claim 33.

NG describes an object-relational mapping tool that generates source code containing classes which preserve both changes to the database schema as well as customizations made to preexisting version of the classes. (See NG, col. 3, lines 34-38.) Specifically, in its Fig. 4B, NG describes source code in the Java programming language for classes "Customer" and

“Order”. The “Customer” class includes an attribute named “Orders_for_Customer”, which attribute is of a “collection” datatype. (See NG, Fig. 4B.) In col. 6, lines 63-64 NG expressly describes that the “collection” datatype is used to indicate a grouping of instances of other classes. Significantly, NG also expressly describes that the “Orders_for_Customer” attribute in the “Customer” class is used to indicate a collection of objects that represent the orders associated with a given customer that is represented by an object instantiated from the “Customer” class. (See NG, col. 6, lines 38-42.)

Thus, NG expressly describes that the values stored in the “Orders_for_Customer” attribute in any and all objects of the “Customer” class identify objects of the “Order” class. However, any and all objects of the “Order” class include all attributes that are defined in the “Order” class – namely, the attributes named “Order_id”, “Date”, and “Customer”. (See NG, Fig. 4B.) In other words, through the “Orders_for_Customer” attribute of the “Customer” class, “Customer” objects can be associated with “Order” objects, and all “Order” objects have the same attributes – namely, the attributes defined in the “Order” class. To put it differently, according to the “Customer” and “Order” classes described in NG, two different customers may have two different orders, but the two different orders necessarily have the same attributes.

In contrast, Claim 33 includes the features of: assigning to said single-valued property attribute of said first instance a first value that associates a first set of one or more attributes with said first instance; assigning to said single-valued property attribute of said second instance a second value that associates a second set of one or more attributes with said second instance; wherein said first set of one or more attributes is different than said second set of one or more attributes. These features of Claim 33 indicate that two different instances of the same class are associated with two different sets of attributes that are not included in

the class or any superclass of the class. NG does not describe these features of Claim 33 because in NG, while different instances of the “Customer” class may be associated with different instances of the “Order” class, any and all instances of the “Order” class necessarily have the same attributes.

Further, it is noted that Claim 33 features assigning first and second values to a single-valued property attribute in first and second instances of the class, respectively. In contrast, NG describes that the “Orders_for_Customer” attribute of the “Customer” class has a “collection” datatype, which by definition is a multi-valued attribute because it can be used to store a collection of multiple data values.

For the foregoing reasons, NG does not describe or suggest all features of Claim 33. Thus, it is respectfully submitted that Claim 33 is patentable over NG. Consideration and allowance of Claim 33 is respectfully requested.

B. INDEPENDENT CLAIM 40

Among other features, Claim 50 recites:

...;
including, **in the structure of said instance of said class, a table for storing data associated with a second set of one or more attributes**, wherein, for **each particular attribute** of said second set of one or more attributes, **said table includes a particular entry** that comprises:
a first field for storing an identifier of said particular attribute; and
a second field for storing one or more data values of said particular attribute;
...;
wherein said second set of one or more attributes do not belong to said class or any superclass of said class;
... .

It is respectfully submitted that the cited reference NG does not describe or suggest the above features of Claim 40.

Previous Office Actions have asserted that the “Customer” table 202 described in Fig. 2 of NG corresponds to the feature of now-canceled Claim 10 of maintaining a table that

includes an entry that indicates that said instance is associated with said attribute. It is respectfully submitted that the “Customer” table 202 described in Fig. 2 of NG is clearly a table that is stored in a relational database. (See NG, col. 5, lines 37-42.)

In contrast, the above features of Claim 40 indicate that a table is included within the structure of an instance of a class, where the table includes entries that store the identifiers and values for attributes that are specific to that instance of the class. In other words, while NG describes a table in a relational database that stores data for customers, Claim 40 features a table within the structure of an instance of a class, where the table is used to store instance-specific attributes and the values for these attributes.

For the foregoing reasons, NG does not describe or suggest all features of Claim 40. Thus, it is respectfully submitted that Claim 40 is patentable over NG. Consideration and allowance of Claim 40 is respectfully requested.

C. DEPENDENT CLAIMS 34-39 AND 41-58

Each of Claims 34-39 and 41-58 depends from one of independent Claims 33 and 40, and thus includes each and every feature of the independent base claim. Thus, each of Claims 34-39 and 41-58 is allowable for at least the reasons given above for Claims 33 and 40. In addition, each of Claims 34-39 and 41-58 introduces one or more additional features that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those features is not included at this time. Therefore, it is respectfully submitted that Claims 34-39 and 41-58 are allowable for the reasons given above with respect to Claims 33 and 40. Consideration and allowance of Claims 34-39 and 41-58 is respectfully requested.

II. CONCLUSION

For the reasons set forth above, the Applicants respectfully submit that allowance of the pending claims is appropriate. Entry of the RCE filed concurrently herewith, and reconsideration of the present application is respectfully requested in light of the amendments and remarks herein.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, a law firm's check for the petition for extension of time fee is enclosed herewith. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,
HICKMAN PALERMO TRUONG & BECKER LLP

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/StoychoDDraganoff#56181/
Stoycho D. Draganoff
Reg. No. 56,181

2055 Gateway Place, Suite 550
San Jose, California 95110-1089
Telephone No.: (408) 414-1080 ext. 208
Facsimile No.: (408) 414-1076